



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 15, 2023

**By Email**

Honorable Jed S. Rakoff  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Steven Perez, a/k/a "Lucha El," 22 Cr. 644***

Dear Judge Rakoff:

The Government respectfully submits this letter at the direction of the Court to request a modification to the defendant's personal recognizance bond. For the reasons stated on the record during a February 15, 2023 bail hearing, the defendant should be removed from home detention and placed on a curfew enforced by location monitoring equipment. The hours of restriction are to be directed by pretrial services.

Thank you for the consideration.

→ SB ORDERED  
*Jed Rakoff*  
USDJ  
2-18-23

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:

*Ashley C. Nicolas*  
Ashley Nicolas and Madison Smyser  
Assistant United States Attorneys  
(212) 637-2467 / -2381

cc: Zawadi Baharanyi, Esq.  
Pretrial Services (by email)